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11 ANTHONY DALTON WOLFF

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 vs.
18 ANTHONY DALTON WOLFF
19 Defendant.

20 Case No. 1:24-cr-00226-DAD-BAM

21 **STIPULATION TO CONTINUE STATUS
22 CONFERENCE; AND ORDER**

23 Date: December 15, 2025
24 Time: 10:00 a.m.
25 Judge: Hon. Dale A Drozd

26 IT IS HEREBY STIPULATED, by and between the parties through their respective
27 counsel, Assistant United States Attorney David Gappa, counsel for plaintiff, and Assistant
28 Federal Defender Griffin Estes, counsel for ANTHONY DALTON WOLFF, that the Court may
vacate the status conference in this case. The parties stipulate to set his matter for a change of
plea on December 15, 2025 at 10:00 am. The district court is available on that date.

The parties stipulate as follows:

- 29 1. By previous order, this matter was set for status on September 24, 2025.
- 30 2. By this stipulation, defendant now moves to set this matter for a change of plea hearing
31 on December 15, 2025, and to exclude time between September 24, 2025, and December 15,
32 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

- 1 3. The parties agree and stipulate, and request that the Court find the following:
- 2 a) The government has represented that the discovery associated with this case includes
- 3 reports, photographs, and audio files. All of this discovery has been either produced directly to
- 4 counsel and/or made available for inspection and copying.
- 5 b) Counsel for defendant was recently re-appointed in this matter. Counsel for defendant
- 6 desires additional time to finalize review discovery, conduct any additional investigation, and
- 7 prepare for a change of plea hearing and sentencing.
- 8 c) Counsel for defendant believes that failure to grant the above-requested continuance
- 9 would deny him the reasonable time necessary for effective preparation, taking into account the
- 10 exercise of due diligence.
- 11 d) The government does not object to the continuance.
- 12 e) Based on the above-stated findings, the ends of justice served by continuing the case as
- 13 requested outweigh the interest of the public and the defendant in a trial within the
- 14 original date prescribed by the Speedy Trial Act.
- 15 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et
- 16 seq., within which trial must commence, the time period of September 24, 2025 to
- 17 December 15, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. §
- 18 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by
- 19 the Court at defendants' request on the basis of the Court's finding that the ends of justice
- 20 served by taking such action outweigh the best interest of the public and the defendants in
- 21 a speedy trial.
- 22 g) The parties also agree that this continuance is necessary for several reasons, including
- 23 but not limited to, the need to permit time for the parties to exchange supplemental
- 24 discovery, engage in plea negotiations, and for the defense to continue its investigation
- 25 and preparation, pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

1 Respectfully submitted,

2 ERIC GRANT
United States Attorney

3

4 Dated: September 17, 2025

5 /s/ David Gappa
DAVID GAPPA
6 Assistant United States Attorney
Attorney for Plaintiff

7 Dated: September 17, 2025

8 HEATHER E. WILLIAMS
Federal Defender

9 /s/ Griffin Estes
10 GRIFFIN ESTES
11 Assistant Federal Defender
Attorney for Defendant
12 ANTHONY DALTON WOLFF

13

14 **ORDER**

15 IT IS SO ORDERED that the status conference set for September 24, 2025, is vacated. A
16 change of plea hearing is set for **December 15, 2025, at 10:00 a.m. in Courtroom 5 before the**
17 **District Judge Dale A. Drozd.** Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

18 IT IS SO ORDERED.

19

20 Dated: September 17, 2025

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22 /s/ Barbara A. McAuliffe
23 UNITED STATES MAGISTRATE JUDGE